

JUDITH A. DESCALSO Cal. Bar No. 103211
LAW OFFICE OF JUDITH A. DESCALSO
960 Canterbury Pl., Ste. 340
Escondido, CA 92025
Phone: (760) 745-8380
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Attorneys for Creditor
CM DISTRIBUTORS, INC.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:) Case No. 19-30088 (DM)
)
)
PG&E CORPORATION) Chapter 11
- and -) (Lead Case)
PACIFIC GAS AND ELECTRIC) (Jointly Administered)
COMPANY,)
)
Debtors.) NOTICE OF DEMAND FOR
) RECLAMATION PURSUANT
) TO 11 U.S.C. §546(c) BY
) CM DISTRIBUTORS, INC.

- ☐ Affects PG&E Corporation)
☒ Affects Pacific Gas and Electric)
Company)
☐ Affects both Debtors)

*All papers shall be filed in the Lead Case,)
No. 19-30088 (DM))

PLEASE TAKE NOTICE that CM Distributors, Inc. ("CM"), sold goods to
the Debtor in the ordinary course of business and received by the Debtor during the

1 45 days prior to the commencement of the Debtor's Chapter 11 case. CM
2 demanded that the Debtor immediately surrender the Goods to CM. Attached
3 hereto as Exhibit "A" is a list of the goods sold and the dates they were received by
4 the Debtor (the "Goods"). Pending the prompt return of the Goods, CM demands
5 that the Debtor protect and segregate the Goods and refrain from selling, using or
6 disposing of the Goods pursuant to 11 USC §361 and 363(c).

7 PLEASE TAKE FURTHER NOTICE that CM reserves all of its rights with
8 respect to the Goods, including without limitation (i) its right to be paid in the
9 ordinary course of business as a post-petition creditor of the Debtor to the extent
10 that the Goods were delivered to the Debtor on or after the Petition Date; (ii) its
11 right to assert a 20-day administrative priority claim pursuant to 11 USC
12 §503(b)(9); (iii) its right to assert a "new value" defense to any preference demand
13 pursuant to 11 USC 547(c)(4); (iv) its right to demand payment of any portion of
14 these invoices as a "cure" payment in connection with the Debtor's assumption of
15 any executory contract between CM and the Debtor, if any, pursuant to 11 USC
16 §365; (v) its right to seek payment of its pre-petition invoices from any non-debtor
17 parties that are co-obligors; (vi) its right to amend, correct, supplement or modify
18 the Reclamation Demand (including filing additional evidence in support thereof)
19 or to file additional demands or claims, including without limitation, a proof of
20 claim in the Debtor's chapter 11 case and all other claims at law or in equity; (vii)
21 its right to setoff or recoupment; and (viii) its right to assert any other rights under
22 applicable law.

23
24 PLEASE TAKE FURTHER NOTICE that the filing of this Notice is not
25 intended to constitute an election of remedies or to waive any of CM's rights under
26 the Bankruptcy Code or any applicable non-bankruptcy law. By filing the Notice
27 of Demand for Reclamation, CM does not consent to the entry of final orders by
28

1 the bankruptcy court on non-core issues and claims and does not waive any
2 jurisdictional defenses.

3
4 Dated: May 2, 2019

LAW OFFICE OF JUDITH A. DESCALSO

5 By: /s/ Judith A. Descalso

6 Judith A. Descalso

7 Attorneys for CM Distributors, Inc.
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EXHIBIT "A"

CM DISTRIBUTORS, INC.

ESCONDIDO, CA 92029-1717
118 S. HALE AVENUE
ESCONDIDO, CA 92029

Invoice

DATE	INVOICE #
12/17/2018	PG00248-1

Phone #	(760) 745-1497
Fax #	(760) 745-4177

BILL TO
Pacific Gas and Electric Company P.O. BOX 7760 SAN FRANCISCO, CA-6 94120-7760 USA

SHIP TO
Pacific Gas and Electric Company 35863 Fairview Road Hinkley, CA-70 92347 USA

P.O. NUMBER	TERMS	VIA	CM PO #
2501632492	Net 30.	CH Robinson	Origin

CPO #	QUANTITY	ITEM CODE	DESCRIPTION	PRICE EACH	AMOUNT
2	1	FB_Item	CM-9D-SK1859GABPMA - VALVE, PLUG, 8IN X 6 IN, FLANGED RING JOINT, ANSI 600, 1500 PSI MOP, 1478 PSI MOP AT MAX TEMP, LOW TEMP CARBON STEEL BODY, 410SST PLUG, NICKEL BRONZE SEATS, LOW TEMP NITRILE SEALS, BARE STEAM, API 6FA, API 6D Sales Tax	43,269.00 7.75%	43,269.00 3,353.35

PLEASE REMIT TO ABOVE ADDRESS.
THANK YOU FOR YOUR BUSINESS.

Total \$46,622.35

ESCONDIDO, CA 92029-1717
118 S. HALE AVENUE
ESCONDIDO, CA 92029

DATE	INVOICE #
12/20/2018	PG00329-2

Phone #	(760) 745-1497
Fax #	(760) 745-4177

Pacific Gas and Electric Company
P.O. BOX 7760
SAN FRANCISCO, CA-6 94120-7760
USA

Pacific Gas and Electric Company
Port of Stockton
810 Ellsberg Dr. Warehouse 810
Stockton, CA-95205
USA

P.O. NUMBER	TERMS	VIA	CM PO #
3501181695	Net 30.	CH Robinson	Origin

[illegible]

Total	\$93,226.61
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Invoice

DATE	INVOICE #
12/20/2018	PG00312

Phone #	(760) 745-1497
Fax #	(760) 745-4177

BILL TO
Pacific Gas and Electric Company P.O. BOX 7760 SAN FRANCISCO, CA-6 94120-7760 USA

SHIP TO
Pacific Gas and Electric Company 2221 South Orange Ave Fresno, CA-90 93725 USA

P.O. NUMBER	TERMS	VIA	CM PO #
3501173114	Net 30.	CH Robinson	Origin

CPO #	QUANTITY	ITEM CODE	DESCRIPTION	PRICE EACH	AMOUNT
00001	2	FB_Item	M036174 - VALVE BALL 4" ANSI 600, WELD END .237" WT, GRADE GR B, "A" DIMENSION = 36 SPEC API 6D FOR BURIED SERVICE PER EMS 4125, FIG 5 SERIAL: 121238135-1 121238135-2 Sales Tax	11,332.00 7.975%	22,664.00 1,807.45

Total	\$24,471.45
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CM DISTRIBUTORS, INC.

ESCONDIDO, CA 92029-1717

118 S. HALE AVENUE

ESCONDIDO, CA 92029

Invoice

DATE	INVOICE #
1/9/2019	PG00315

Phone #	(760) 745-1497
Fax #	(760) 745-4177

BILL TO
Pacific Gas and Electric Company P.O. BOX 7760 SAN FRANCISCO, CA-6 94120-7760 USA

SHIP TO
Pacific Gas and Electric Company 6121 Bollinger Canyon Rd San Ramon, CA-70 94583 USA

P.O. NUMBER	TERMS	VIA	CM PO #
2700147368	Net 30.	CH Robinson	Origin

CPO #	QUANTITY	ITEM CODE	DESCRIPTION	PRICE EACH	AMOUNT
1	1	FB_Item	CM-OEM-DRAWING - OEM Drawing (electronic copy) 3 inch ANSI 900 RF, Reg. port TXT, Super G,G.O	300.00	300.00
2	1	FB_Item	CM-OEM4-DRAWING - OEM Drawing (electronic copy) 4 inch ANSI 900 RF, Reg. port TXT, Super G,G.O	300.00	300.00

PLEASE REMIT TO ABOVE ADDRESS.
THANK YOU FOR YOUR BUSINESS.**Total** \$600.00



CAMP-2030

PACKING LIST



SHIPPING MANIFEST

DATE 12/17/18		DATE SHIPPED		PACKING LIST / MESA NO. 258158	
BILL OF LADING NO.		CUSTOMER ORDER NO.		CAMERON PURCHASE ORDER NO.	
SHIP TO can Distributors 118 S. HALE AVE ESCONDIDO CA 92024		SHIP FROM 6700 BRIGLE, HOUSTON, TX 77062 2501 60TH Fwy, Katy, TX 77459 2010 GH CIRCLE, WALLER, TX 77484 6009 THOMAS ROAD, HOUSTON, TX 77041 OTHER 1951 E. CASHMAN ST. RANCHO DOMINGUEZ, CA 90220		3001 HWY. 182, BAYOU VISTA, LA 70088 247 HOLLOWAY BLVD., VILLE PLATTE, LA 70566 815 S.E. 20TH ST., OKLAHOMA CITY, OK 73129 7300 S.W. 20TH ST., OKLAHOMA CITY, OK 73179	
SHIP VIA <input type="checkbox"/> WILL CALL <input type="checkbox"/> COLLECT <input type="checkbox"/> PREPAID		ROUTING		DATE WANTED	
<input type="checkbox"/> TRUCK <input type="checkbox"/> UPS <input type="checkbox"/> AIR <input type="checkbox"/> PARCEL POST		PART NO.		DESCRIPTION	
ITEM NO.	QUANTITY	UNIT	PRICE	4" 606 mm 23 1/2" 5 1/2" 30"	
122	2			201235135-1, 2	
YOUNG & RUBICAM					
Optis PRAC 30					
RANCHO					
REMARKS					

PREPARED BY	DATE 12/18/18
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PURCHASING COPY



CALM-20230

PURCHASING COPY



Valves & Measurement

ENGINEERED VALVES
257 Holloway Blvd
Ville Platte, LA 70586

CUSTOMER:	CM DISTRIBUTORS INC		
END USER:	PG&E		
PROJECT NAME:	N/A		
PROJECT NUMBER:	N/A		
PURCHASE ORDER:	PG00234		
CUSTOMER DOC. NAME:	GENERAL ARRANGEMENT DRAWING		
CUSTOMER DOC. NO.:	SD-3539508-10		
CUSTOMER VDR CODE:	N/A		
CUSTOMER TAG NO.:	N/A		
NOTE:			
01	11/7/2018	For Approval	H. Trahan
CUSTOMER REVISION NO.	REVISION DATE	ISSUE PURPOSE	ORIGINATOR
FOR CAMERON USE ONLY			
SALES ORDER NO.:	3539508		
SUPPLIER DOC. NO.:	SD-3539508-10	REVISION NO.:	01

Schlumberger-Private



Valves & Measurement

ENGINEERED VALVES
257 Holloway Blvd
Ville Platte, LA 70586

CUSTOMER:	CM DISTRIBUTORS INC		
END USER:	PG&E		
PROJECT NAME:	N/A		
PROJECT NUMBER:	N/A		
PURCHASE ORDER:	PG00173		
CUSTOMER DOC. NAME:	GENERAL ARRANGEMENT DRAWING		
CUSTOMER DOC. NO.:	SD-3474986-10		
CUSTOMER VDR CODE:	N/A		
CUSTOMER TAG NO.:	N/A		
NOTE:			
01	11/7/2018	For Approval	H. Trahan
CUSTOMER REVISION NO.	REVISION DATE	ISSUE PURPOSE	ORIGINATION
FOR CAMERON USE ONLY			
SALES ORDER NO.:	3474986		
SUPPLIER DOC. NO.:	SD-3474986-10	REVISION NO.:	01

Schlumberger-Private



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SHIPPER'S NO. 283475895		CRN SEE BELOW		ROUTING LAF-SNB		FREIGHT BILL NO. 098288911	
PICKUP DATE 12/17/18	CODE TO 165D	PO. NO. 2501632492	NO. OF PCS=	SHIPPER 014364-0000	CONSIGNEE 014364-0000		
SHIPPER PACIFIC GAS & ELECTRIC STEPHANIE VIDRINE 257 HOLLOWAY BLVD VILLE PLATTE LA 70586				CONSIGNEE PG&E PRIMA SMITH 35863 FAIRVIEW RD HINKLEY CA 92347			

PIECES	DESCRIPTION	WEIGHT (LBS.)	RATE	CHARGES
1 PLT	<p>*NOTES FOLLOW: *IF PROBLEMS: CH ROBINSON *PHONE: 800-999-5250 TOTAL IND PIECES: 1 OF 1 PC 8 INCH TEKTEAM PLUG VALVE CL 50 ITEM 051080-07 G.O. CUSTOMER SERVICE / CALIFORNIA COMPLIANCE SURCHARGE / PACKING LIST REQUIRED COMMENTS: CUSTOMS BROKERAGE HANDLED BY CH ROBINSON-PLEASE EMAIL PAPS NUMBER TO 606-BORDER@CHROBINSON.COM SHIPPER SPECIAL INSTRUCTIONS: CONTACT-MACY WILLIS 337-381-0498 CONSIGNEE SPECIAL INSTRUCTIONS:</p>	1,050		

RECEIVED
DEC 21 2018

BILL TO TPB 165104-S001		GROSS AMOUNT 420957		PAY THIS AMOUNT	
CUBE 0033		TAR ABF8899			
DELIVERY DUE 12/26/18		CZIP 70586			
DRIVER Jose Cruz		DZIP 92347			
DATE MON 12/31		SPEC HAND			
PRIOR PRO		REMIT TO			
YOUR ACCEPTANCE OF DELIVERY IS SUBJECT TO ABF 111 SERIES TERMS		CONSIGNEE		BY (CUSTOMER'S SIGNATURE)	



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SHIPPER'S NO. 283475895		CRN SEE BELOW		ROUTING LAF-SNB		FREIGHT BILL NO. 098288911	
PICKUP DATE 12/17/18	CODE TO 165D	PO. NO. 2501632492	NO. OF PCS=	SHIPPER 014364-0000	CONSIGNEE 014364-0000		
SHIPPER PACIFIC GAS & ELECTRIC STEPHANIE VIDRINE 257 HOLLOWAY BLVD VILLE PLATTE LA 70586				CONSIGNEE PG&E PRIMA SMITH 35863 FAIRVIEW RD HINKLEY CA 92347			

PIECES	DESCRIPTION	WEIGHT (LBS.)	RATE	CHARGES
	<p>CONTACT: JASON NALL 559-341-4930 ONE ENVELOPE CONTAINING MATERIAL DOCS SHIPPER PHONE: 337-363-9666 // FUEL SURCHARGE /AFKI,6094 CRN: 10406133 CRN: 22187234 CRN: 2501632492 CRN: 2501632492 CRN: 283482774 ABF MEASURED CUBE: 33.330 CUFT CONS PHONE: 415-973-5096</p>			

RECEIVED
DEC 21 2018

BILL TO TPB 165104-S001		GROSS AMOUNT 420957		PAY THIS AMOUNT	
CUBE 0033		TAR ABF8899			
DELIVERY DUE 12/21		CZIP 70586			
DRIVER 1221		DZIP 92347			
DATE MON 12/31		SPEC HAND			
PRIOR PRO		REMIT TO			
YOUR ACCEPTANCE OF DELIVERY IS SUBJECT TO ABF 111 SERIES TERMS		CONSIGNEE		BY (CUSTOMER'S SIGNATURE)	

STRAIGHT BILL OF LADING - SHORT FORM - ORIGINAL - NOT NEGOTIABLE

This form contains only the information necessary for the motor carrier to deliver, rate, and invoice the shipment described below.

Shipper: Ship Date 12/18/2018

Pacific Gas & Electric
257 Holloway Blvd
Ville Platte, LA 70586
Stephanie Vidrine (337) 363-9666
Reference Number: 10406133

Carrier:	ABF Freight System Inc
Pro#:	
Load#:	283475895
Ship ID#:	22187234

Consignee: Due Date 12/26/2018

PG&E
35863 FAIRVIEW RD
Hinkley, CA 92347
PRIMA SMITH (415) 973-5096
Reference Number: 2501632492

All Freight charges PPD/3rd party bill to:
CHRLTL
14800 Charlson Road
Suite 2100
Eden Prairie, MN 55347

Type/ Reference #	SKU/ UPC	Description	QTY/ UOM	Pallets	Weight	Category/ Temp	NMFC/ Class
PO: 2501632492		8 INCH TEXTEAM PLUG VALVE	1 Pieces	1.00	1050	Dry	50
Dimensions: L 60.0in x W 40.0in x H 24.0in			1	1	1050		

Shipper Special Instructions:

CONTACT: Macy Willis 337-381-0498

Consignee Special Instructions:

CONTACT: Jason Nall 559-341-4930

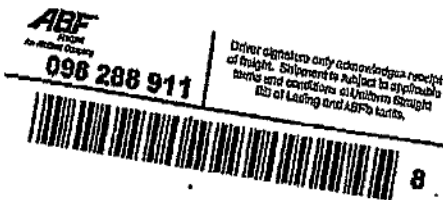
Comments:

For problems on this shipment, please contact CH Robinson at 800-999-5250 - Customs Brokerage Handled By CH Robinson - Please Email PAPS Number to 606-border@chrobinson.com

The Shipper certifies that the above named materials are properly classified, described, marked, labeled and packaged, and are in proper condition for transportation, according to the applicable regulations of the Department Of Transportation.

Shipper Signature X [Signature] Date: 12/17/2018 Trailer# _____
Consignee Signature X _____ Date: _____ Seal# _____
Driver Signature X [Signature] Date: 12/17/18 Seal# _____

Permanent post-office address of shipper.



ONE ENVELOPE CONTAINING MATERIAL DOCS

Packing List

3501173114

CM DISTRIBUTORS, INC.

CM DISTRIBUTORS, INC.
118 S. HALE AVENUE
ESCONDIDO, CA 92029-1717
(760) 745-1497 FAX (760)
ESCONDIDO, CA-70 92029
Phone: (760) 745-1497
Fax: (760) 745-4177
Email: theresa@cmdistributorsinc.com



Ship To:

Pacific Gas and Electric Company
2221 South Orange Ave
Fresno, CA-70 93725

PO Number: 3501173114

Notes

Bill To:

Pacific Gas and Electric Company
P.O. BOX 7760
SAN FRANCISCO, CA-8 94120-7760

Carton Count	Reg. Ship Date	FOB Point	Shipping Terms	Ship Via	Ship Order
1	10/9/18	Origin	Prepaid & Billed	CH Robinson	PG00312



Carton Information :

Weight 0 lbs

Line #	Stock #	Material Description/Mfg	Qty Ordered	Qty Shipped	Qty Remaining to be shipped
1	M036174	VALVE BALL 4" ANSI 600, WELD END .237" WT, GRADE GR B, "A" DIMENSION = 36 SPEC API 6D FOR BURIED SERVICE PER EMS 4125, FIG 5 121238135-1, -2	2ea	2ea	0ea

* Part numbers in parenthesis are CM DISTRIBUTORS, INC. numbers for the part

PRINT: Miguel Castillo SIGNATURE: [Signature] DATE: _____
December 17, 2018 2:23:11 PM PST Page 1 of 1